Reconsideration based on the following remarks is respectfully requested.

The attached Appendix includes a marked-up copy of each rewritten claim (37 C.F.R. §1.121(c)(1)(ii)).

I. The Claims Define Patentable Subject Matter

The Office Action rejects claims 2, 3, 6 and 12 under 35 U.S.C. §103(a) over Pace (U.S. Patent No. 5,866,441) in view of Fujiki et al. (U.S. Patent No. 5,736,791). This rejection is respectfully traversed.

Pace, whether alone or in combination with Fujiki et al., does not disclose or suggest a semiconductor device including a bonding pad, wherein the bonding pad is a multiple wiring layer structure, the bonding pad including, inter alia, at least one second through hole provided in a second insulating layer, and an at least one first through hole disposed substantially directly above the at least second through hole, as recited in claim 2.

Instead, Fig. 5H of Pace discloses a substrate including multiple wiring layer. The multiple wirings in Fig. 5H is not a semiconductor chip, but is instead a printed circuit board for assembly process. Thus, Pace could not possible disclose the semiconductor device of claim 2.

The Office Action attempts to make up for the deficiencies of Pace by combining Pace with Fujiki et al. However, Fujiki et al. also does not disclose the semiconductor device of claim 2. Specifically, Fujiki et al. does not disclose the claimed first and second through holes.

For at least these reasons, it is respectfully submitted that claim 2 is patentable over the applied references. The dependent claims are likewise patentable over the applied references for at least the reasons discussed as well as for the additional features they recite. Applicant respectfully requests that the rejection under 35 U.S.C. §103 be withdrawn.

II. Conclusion

In view of the foregoing, Applicant respectfully submits that this application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited.

Should the Examiner believe anything further is desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

Benjamin M. Halpern
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JAO:BMH/gpn

Attachment:
Appendix

Date: April 23, 2002

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE AUTHORIZATION
Please grant any extension necessary for entry;
Charge any fee due to our Deposit Account No. 15-0461

APPENDIX

Changes to Claims:

The following is a marked-up version of the amended claim:

2. (~~Three~~ Four Times Amended) A semiconductor device including a bonding pad, wherein the bonding pad is ~~having~~ a multiple wiring layer structure, the bonding pad comprising:

a first conductive layer connected to a conductive member for external connection;

a second conductive layer disposed below said first conductive layer, the second conductive layer having a plurality of openings;

a third conductive layer disposed below said second conductive layer;

a first insulating interlayer disposed between said first conductive layer and said second conductive layer;

at least one first through hole provided in said first insulating interlayer;

a fourth conductive layer filling said at least one first through hole;

a second insulating interlayer disposed between said second conductive layer and said third conductive layer;

at least one second through hole provided in said second insulating interlayer the said at least one first through hole disposed substantially directly above said at least one second through hole; and

a fifth conductive layer filling said at least one second through hole, wherein said first insulating interlayer and said second insulating interlayer are connected to each other through said openings of said second conductive layer, and a contiguous section of said first insulating interlayer with said second insulating interlayer is, thereby, formed between said first conductive layer and said third conductive layer.